

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Somerville Public Schools, *et al.*,

Plaintiffs,

v.

Donald J. Trump, *et al.*,

Defendants.

Civil Case No. 1:25-cv-10677

[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION

Upon consideration of Plaintiffs’ motion for a preliminary injunction, the accompanying memorandum, any related responses and replies filed, and the imminent irreparable harm to Plaintiffs alleged, it is hereby

ORDERED that Agency Defendants, and their officers, agents, servants, employees, attorneys, and other persons who are in active concert or participation with any of them (collectively, the “Enjoined Parties”), are enjoined from proceeding with the mass termination order announced by the Agency Defendants on March 11, 2025 (“Mass Termination Order”); it is further

ORDERED that the Enjoined Parties are enjoined from implementing, giving effect to, or reinstating the Mass Termination Order under a different name; it is further

ORDERED that Agency Defendants reinstate federal employees whose employment was terminated or otherwise eliminated on or after March 11, 2025, as part of the Mass Termination Order, including ensuring that those employees are placed on active duty status, effective no later than 48 hours of entry of this Order; it is further

ORDERED that Agency Defendants provide notice of the preliminary injunction within 24 hours of entry to the employees subject to the Mass Termination Order, in the form attached to this Order as Exhibit A; it is further

ORDERED that the Agency Defendants file a status report with this Court within 72 hours, and weekly thereafter until otherwise ordered by this Court, describing all steps the Agency Defendants have taken to comply with the Court’s Order; it is further

ORDERED that to the extent Defendants seek to take additional steps to effectuate the closing of the Department of Education, including but not limited to transferring statutorily

mandated offices or functions from the Department of Education to other government agencies, Defendants shall provide at least ten (10) days prior notice to Plaintiffs and the Court.

This ORDER shall apply to the maximum extent provided for by Fed. R. Civ. P. 65(d)(2) and shall persist until further order of this Court.

THE HON. MYONG J. JOUN
UNITED STATES DISTRICT JUDGE

SO ORDERED this ____ day of April , 2025.

EXHIBIT A

NOTICE OF COURT ORDER

You are hereby advised that a preliminary injunction has been entered in the case of *Somerville Public Schools, et al. v. Trump, et al.*, No. 1:25-cv-10677 (D. Mass.), ECF No. [] ([Date]). You are receiving this Notice pursuant to the Court's instruction that notice of the Order be provided to certain employees of the United States Department of Education. A copy of the Court's Order is attached for reference.

By the terms of the Order, if you are a Department of Education employee who received a notice of termination or were told that you were subject to a "reduction in force" on or about March 11, 2025, your employment is REINSTATED as of [date]. You are also being restored to ACTIVE DUTY status so that you can continue your work for the Department of Education as of [date].

As the Court's Order reflects, the above terms are in effect while litigation in the case is ongoing. Until further notice, the Court's Order is in effect and Defendants must comply with it.

If you have any questions about the scope or effect of the Court's Order, please contact the Department of Education's Chief Human Capital Officer, as appropriate. Thank you for your attention to this matter.